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August 2, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A235
Washington, DC 20554

RE: TRS Fund Administration – Two-line Captioned Telephone Order,
CG Docket No. 03-123

Dear Ms. Dortch:

The National Exchange Carrier Association, Inc. (NECA) herein submits the proposed factor for use during the July 2005 – June 2006 funding period to allocate the number of inbound two-line captioned telephone minutes to the Interstate TRS Fund for reimbursement.

In the *Two-line Captioned Telephone Order* released July 19, 2005, the FCC agreed with NECA's recommendation that the same allocation methodology presently used for toll free (800) and pay-per-call (900) number calls should be used for inbound two-line captioned telephone call minutes and adopted the proposed methodology going forward.¹ The share of 800 and 900 call minutes compensable from the Interstate TRS Fund is based on the relationship of interstate and international TRS minutes to intrastate toll, interstate and international traditional TRS minutes.² For inbound two-line captioned telephone calls, however, the factor is based on the relationship between interstate and international TRS minutes to the total of all traditional TRS minutes. The FCC ordered this allocation factor, along with the allocation factor for 800 and 900 number calls, to be reflected in the annual fund filing that proposes the TRS compensation rates for the following TRS Fund year.³

For the 2005-2006 funding period, the FCC directed NECA to determine an allocation factor and submit it to the Commission for approval or modification.⁴ NECA calculated the factor by using projections of traditional TRS minutes for 2005 and 2006 as submitted by relay service providers with their annual data submissions in January 2005. Interstate and international minutes for both years

¹ See In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67, CG Docket No. 03-123, *Order*, FCC 05-141 (rel. July 19, 2005) (*Two-line Captioned Telephone Order*), ¶12.

² Because 800 and 900 number calls are not local, local call minutes are not included in the calculation of their allocation factor.

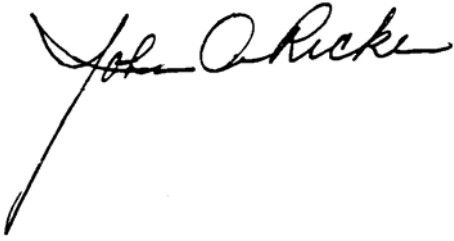
³ *Two-line Captioned Telephone Order* at ¶12.

⁴ *Id.* at 6, n.42.

totaled 24,459,907; local, intrastate, interstate and international minutes totaled 213,957,866. Dividing interstate and international minutes by total minutes results in a proposed interstate factor of 11% for inbound two-line captioned telephone minutes. The remaining 89% of minutes would continue to be allocated to the intrastate jurisdiction.

In accordance with the Commission's rules, this *Letter* has been filed electronically in the above referenced docket.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Ricks", is written over a horizontal red line. The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Cc: Thomas Chandler, Consumer and Governmental Affairs Bureau
Jay Keithley, Consumer and Governmental Affairs Bureau